

II RESPONSES TO COMMENTS FROM CITIZENS OF THE SHATTUCK COMMUNITY

1. *Comment: Remove the waste from the Shattuck (Overland, etc.) neighborhood and don't put it in someone else's backyard.*

Response: The waste will be removed from the Shattuck Site in Denver to a licensed disposal or recycling facility.

2. *Comment: Removal is the only fully-protective remedy.*

Response: While none of the experts involved in the review of the Shattuck Site found that the Shattuck remedy was not currently safe, there is uncertainty that the Shattuck remedy will protect human health and the environment for the long-term, i.e., from several hundred to over a thousand years. This uncertainty, coupled with the community and state's discomfort with relying on monitoring and repeated five-year reviews to evaluate the continued effectiveness of any onsite remedy, has caused USEPA to select removal and off-site disposal.

3. *Comment: Removal must be executed in a safe manner.*

Response: USEPA and its contractors will use all required measures to ensure worker safety, community safety, dust control, and site security during demolition and removal of the waste monolith. Regarding transportation, USEPA recognizes that any time the amount of traffic increases, there is a potential for an increase in accidents. Transportation routes will be chosen to minimize potential accidents and drivers will take extra safety training. Support en route, such as flag people, and restricted travel schedules will be instituted as necessary. Spill control and emergency hazardous material response procedures will be put in place. USEPA will coordinate with local agencies to ensure that all reasonable safety measures are taken. All state and federal transportation regulations will be strictly followed.

4. *Comment: Keep pollution from the river and groundwater. There is water/groundwater contamination.*

Response: Removal of the waste will remove much of the source of pollution for groundwater and for any surface water runoff. A working group is currently studying the groundwater issue. This ROD does not address groundwater. Groundwater will be addressed separately.

5. *Comment: Low-level radioactive waste poses a danger to human health and the environment.*

Response: Low-level radioactive waste is stored or disposed of in facilities that control and prevent contaminant releases, and are protective of human health and environment.

6. *Comment: Clean up the site so it can be used for anything.*

Response: The intent is that the site will be available for unlimited reuse as determined appropriate by the community and city following removal of the waste and final cleanup.

7. *Comment: The site has caused and exacerbated illness.*

Response: USEPA has seen no evidence that the Shattuck waste has or has not caused or exacerbated illness. Removal of the waste will remove any potential of site contamination affecting human health.

8. *Comment: The present remedy is an eyesore.*

Response: Waste removal and cleanup will allow the site to be available for unlimited reuse as determined appropriate by the community and city.

9. *Comment: The present remedy scares people.*

Response: Waste removal and cleanup will remove any threat of site contamination affecting human health.

10. *Comment: The removal should be executed as soon as possible*

Response: USEPA intends to move quickly to design and implement the off-site disposal remedy. EPA's Project Manager will develop a schedule for implementation that will be shared with interested stakeholders.

11. *Comment: Removal would maintain or increase property values.*

Response: While waste removal and site cleanup cannot guarantee a positive change in property values, the site being available for unlimited reuse as determined by the community and city may have a positive effect on property

values.

12. *Comment: An in-place remedy would not have occurred in another neighborhood.*

Response: In-place remedies occurred in other Operable Units of the Denver Radium Site, including the Capitol Hill area of Denver.

13. *Comment: Keep public informed about removal plan and water contamination.*

Response: USEPA will update the Shattuck CIP, which will require interviews with stakeholders to identify their concerns, priorities and determine how to best involve the community in the off-site remedy. The community is developing a Community Advisory Group (CAG) comprised of representatives of the community, city, state, USEPA and others. The CAG will meet regularly to review the remedy, share concerns, and provide advice and answers.

14. *Comment: Was removal agreed to at hearings?*

Response: Off-site removal was announced as the preferred remedial alternative by USEPA Assistant Administrator Fields on November 15, 1999.

15. *Comment: Consider using the train for removal; the train is nearby.*

Response: Use of rail transportation is being considered.

16. *Comment: Removal risks outweigh long term impacts of in-place remedy.*

Response: While none of the experts involved in the review of the Shattuck site found that the Shattuck remedy was not currently safe, there is uncertainty that the Shattuck remedy will protect human health and the environment for the long-term, i.e., from several hundred to over a thousand years. This uncertainty, coupled with the community and state's discomfort with relying on monitoring and repeated five-year reviews to evaluate the continued effectiveness of any onsite remedy outweighs the controllable risks of removal.

17. *Comment: Do it right this time.*

Response: USEPA selected the original remedy in accordance with the NCP. USEPA also selected this ROD Amendment in accordance with the NCP as the result of the Five-Year Review, and paid attention to the importance of

community acceptance of the remedy.

- 18.** *Comment: Community members can't just move away.*

Response: USEPA understands this.

- 19.** *Comment: Think of the grandchildren and the 7th generation*

Response: Waste removal will remove any current and future potential threat to human health and the environment and allow the community and city to reuse the site as deemed appropriate.